REMOVAL PROGRAM
AFTER ACTION REPORT
FOR THE
PARK STREET SITE
(b) (6)
BENNINGTON, BENNINGTON COUNTY, VERMONT
17 SEPTEMBER THROUGH 12 JULY 2013

Prepared For:

U.S. Environmental Protection Agency
Region I
Emergency Planning and Response Branch
5 Post Office Square, Suite 100
Boston, Massachusetts 02109-3912

CONTRACT NO. EP-W-05-042

TDD NO. 01-12-08-0005

TASK NO. 0826

DC NO. R-7529

Submitted By:

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Superfund Technical Assessment and Response Team III (START)
3 Riverside Drive
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September 2013

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1.0 INTRODUCTION

The following report, entitled *Removal Program After Action Report for the Park Street Site, Bennington, Bennington County, Vermont,* is a chronological summary of the response actions taken by the U.S. Environmental Protection Agency (EPA), Region I, Emergency Planning and Response Branch (EPRB). The report details the situation as it developed, actions taken, and resources committed.

Site activities included: conducting particulate air monitoring; installing temporary lighting; performing decontamination of the residential basement including items located within the basement; removing and storing basement items in a temporary storage container; waterproofing the basement; and returning items to their original place in the basement.

2.0 SITE CONDITIONS AND BACKGROUND

2.1 Site Location and Description

The Park Street site (the site) is located on Park Street and Bowen Road in Bennington, Bennington County, Vermont. Geographic coordinates of the site are 42° 53' 27.9" north latitude, and 73° 11' 32.9" west longitude, as measured from the approximate center of the site (see Appendix B, Figure 1). The site consists of Little League baseball fields, two residential properties, and adjacent wetlands. The site is adjacent to the former Jard Company, Inc. (JARD) site, and is abutted to the west by the Bennington Square Shopping Center, to the north by Bowen Road and industrial properties, to the east by the former JARD site, and to the south by the Roaring Branch of the Walloomsac River (Roaring Branch) (see Appendix C, Figure 2).

2.2 Site History/Previous Actions

The site has been impacted by contamination from the former JARD site, a former capacitor and transformer manufacturing facility that produced capacitors, non-fluid transformers, and motors used in household appliances. JARD generated wastes associated with its manufacturing processes from 1969 to 1986. These wastes included polychlorinated biphenyls (PCBs); a variety of volatile organic compounds (VOCs), including trichloroethylene (TCE), 1,1,1-trichloroethane (1,1,1-TCA), and toluene; semivolatile organic compounds (SVOCs); waste hydraulic and lubricating oils; waste paints and varnishes; waste zinc oxide; waste-contaminated rejected capacitors; spent SpeediDri™; and PCB- and phthalate-contaminated wastewater. From September 2006 through August 2007, U.S. Environmental Protection Agency (EPA) conducted a removal action at the former Jard site, removing PCB-contaminated materials.

The Vermont Department of Environmental Conservation (VT DEC) raised concerns regarding surface and subsurface soil and groundwater contamination related to the site that is located down gradient of the former JARD site. Recent sampling by VTDEC has detected PCB's in groundwater at properties located near the former JARD property, which is suspected to be the source of the contamination. Groundwater levels near the site are approximately 5 to 8 feet below ground surface. Groundwater infiltration at residential homes located near the site has been identified as a potential source of PCB contamination to soils and surface waters at the properties.

From 2 through 5 April 2012, EPA and Weston Solutions, Inc. Superfund Technical Assessment and Response Team (START) personnel mobilized to the site to conduct sampling as part of a Preliminary Assessment / Site Investigation (PA/SI). Personnel collected 104 surface and subsurface soil samples, 9 sediment samples, 6 surface water samples, and 4 floor sweeping samples from the site. All samples were screened on site for PCBs by the EPA Office of Environmental Measurement and evaluation (OEME) Mobile Laboratory. Approximately 10% of samples were also sent for laboratory confirmation PCB analysis at the OEME laboratory in North Chelmsford, Massachusetts (MA).

PCB's in the groundwater are suspected to be the source of contamination to soils and surface waters due to periodic infiltration into residential basements through inactive wells and other openings, and subsequent drainage via sumps and outfall pipes into yards and retention ponds. EPA samples of floor sweepings from the basement of a residential property detected PCB's at concentrations up to 14 ppm. PCB's were also detected in soils and surface water in a pond on a residential property, in the soil of sump areas located in the basements, in the soil at a nearby wetland, and in soil at the Little League field located along the Jard fence line.

3.0 SUMMARY OF FEDERAL RESPONSE ACTIONS

3.1 Organization of the Response

ORGANIZATION OF THE RESPONSE		
Organization	Representatives	Responsibilities
U.S. Environmental Protection Agency (EPA) Emergency Planning and Response Branch (EPRB) 5 Post Office Square, Suite 100 Boston, MA 02109-3912 (617) 918-1052	Daniel Burgo	EPA On-Scene Coordinator (OSC) responsible for the initiation, oversight, and completion of all removal activities. The OSC coordinated with State and local officials.
Weston Solutions, Inc. (Weston) Superfund Technical Assessment and Response Team (START) 3 Riverside Drive Andover, MA 01810 (978) 552-2100	Christine Scesny Ken Robinson John Burton	START Site Personnel that provided the OSC with technical assistance, site documentation, site health and safety monitoring, air monitoring, and draft and final report preparation.
Environmental Restoration (ER) LLC 40 Messina Drive Braintree, MA 02184 (860) 769-7356	Christopher May	Response Manager (RM) for the ERRS contractor that performed removal activities. The RM was responsible for oversight and organization of mobilization, demobilization, and waste removal activities.

3.2 Mobilization and Site Preparation

The site-specific removal health and safety plan (HASP) was reviewed and signed by all personnel before any work commenced. In addition, emergency telephone numbers and directions to the hospital were posted and work zones were delineated. All activities were performed in appropriate personal protective equipment (PPE) in accordance with the HASP. The HASP was prepared by START personnel as a separate document, entitled *Health and Safety Plan for the Park Street Site,*

Bennington, Bennington County, Vermont. On 17 September 2012, the mobilization and staging of Emergency Rapid Response Services (ERRS) equipment was initiated.

Site preparation activities conducted by ERRS personnel consisted of: reviewing and signing the Health and Safety Plan, mobilizing site equipment and supplies, receiving delivery of supplies, and preparing staging area.

3.3 Chronology of Removal Activities

Week of 23 July 2012

EPA Office of Site Remediation and Restoration (OSRR) Division Director James T. Owens III, signed the Action Memorandum approving the proposed removal action.

Week of 10 September 2012

On 12 September 2012, a site walk was conducted with the following personnel: EPA On-Scene Coordinator (OSC) Daniel Burgo, ERRS Response Manager (RM) Chris May, and ERRS Foreman Blake MacKinney. Activities for the day included:

- Reviewing and signing the HASP.
- Conducting a reconnaissance of the site property.

Week of 19 September 2012

Personnel on site:

OSC – EPA	Daniel Burgo
START – Weston Solutions, Inc.	Christine Scesny
ERRS Response Manager (RM) – Environmental Restoration (ER)	Christopher May
ERRS Crew – Environmental Restoration (ER)	1 foreman 2 laborers

Equipment on site:

Type	Quantity
High Efficiency Particulate Air (HEPA) Vacuum	1
Truck	2
Storage Container	2
Portable Toilet	2
Dumpster	1

Activities for the week included:

- Mobilizing of crew and equipment.
- Reviewing and signing of the site HASP.

- Conducting air monitoring for particulates, volatile organic compounds (VOCs), and explosive atmosphere as specified in the HASP.
- Decontaminating the basement areas and the items within the basement of (b) (6) using a High Efficiency Particulate Air (HEPA) vacuum before wiping areas and items with cleaning products. The cleaning products used in the decontamination were Lestoil® and Pine Sol®.
- Replacing all the basement items to their original locations after the decontamination activities had been completed.

On 22 September 2012, Northern Basement Systems representative Mike Doherty mobilized to the site to discuss the basement waterproofing of the two residential properties.

On 22 September 2012, decontamination activities had been completed and all personnel departed from the site. The basement waterproofing activities would be completed at a later date.

For the duration of the removal action, START photodocumented site activities (see Appendix B – Photodocumentation Log).

Week of 25 March 2013

Personnel on site:

OSC – EPA	Daniel Burgo
START – Weston Solutions, Inc.	John Burton
RM – Environmental Restoration	Christopher May
Crew – Environmental Restoration	2 laborers

Equipment on site:

Type	Quantity
Truck	1
Portable Storage Unit	1

Activities for the week included:

- Mobilizing of crew and equipment.
- Review and signing of the site HASP.
- Discussing the storage of all items located in the basement of (b) (6) in a portable storage unit.
- Discussing basement waterproofing activities to take place at (b) (6).

Key dates:

On 27 March 2013, EPA OSC Burgo, ERRS, and START member John Burton arrived on-site.

On 28 March 2013, all personnel demobilized from the site.

Week of 13 May 2013

Personnel on site:

OSC – EPA	Daniel Burgo
START – Weston Solutions, Inc.	Kenneth Robinson
RM – Environmental Restoration	Blake McKinney
Crew – Environmental Restoration	2 laborers

Equipment on site:

Type	Quantity
Truck	1
Portable Storage Unit	2
HEPA Vacuum	1
Portable Toilet	1

Activities for the week included:

- Mobilizing of crew and equipment.
- Reviewing and signing of the site HASP.
- Storing all items from the basement of (b) (6) in a portable storage unit for the duration basement waterproofing activities.
- Waterproofing the basement at (b) (6) to insure protection against PCB contamination via flooding.
- Installing a poly liner on the basement walls and installing an inner drain/French drain along the base of the walls at (b) (6).
- Replacing all the basement items back to their original locations after the basement waterproofing activities had been completed.

Key dates:

On 14 May 2013, EPA OSC Burgo, ERRS, and START member Robinson arrived on site. ERRS crew removed all of the property owners belongings from the basement at (b) (6) and temporarily stored them in a portable storage unit.

On 15 and 16 May 2013, Northern Basement System crew mobilized to site to conduct basement waterproofing activities (b) (6).

On 17 May 2013, after the completion of the basement waterproofing activities ERRS crew returned all of the temporarily stored belongings back to the basements of (b) (6).

Week of 8 July 2013

Personnel on site:

OSC – EPA	Daniel Burgo
RM – Environmental Restoration	Christopher May
Crew – Environmental Restoration	1 laborer

Key dates:

On 12 July 2013, ERRS mobilized to site to restore a section of the (b) (6) house siding.

On 12 July 2013, removal activities had been completed and all personnel demobilized from the site.

4.0 ESTIMATED COSTS OF THE REMOVAL ACTION

EPA resources committed under this Removal Action are summarized below:

Cost Category	Ceiling	Costs Incurred	Remainder
Regional Removal Allowance Costs			
ERRS	**$500,000**	**$ 81,379.54.**	**$ 418,620.46**
Other Extramural Costs Not Funded from the Regional Allowance			
START Contractor	**$250,000**	**$35,201.00**	**$ 214,799.00**
Extramural Contingency	**$75,000**	**$ 0.00**	**$ 75,000.00**
Total Removal Project Costs	**$825,000**	**$ 116,580.54**	**$ 708,419.46**

This accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

REFERENCES

[1] MicroPath U.S. Geological Survey (USGS). (7.5-minute series topographic) Quadrangle map: Bennington, Vermont.

[2] Bing Maps Aerial. 2010. Microsoft Corporation, Available from http://www.bing.com. Internet accessed 23 March 2012.

[4] Weston Solutions, Inc. START (Superfund Technical Assessment and Response Team). 2012. Field Logbook for the Park Street Site. TDD No. 12-03-0001.

[5] Weston Solutions, Inc. START (Superfund Technical Assessment and Response Team). 2012. Removal Program Preliminary Assessment/Site Investigation Report for the Park Street Site, Bennington, Bennington County, Vermont, TDD No. 01-12-03-0002. September.

[6] Weston Solutions, Inc. START (Superfund Technical Assessment and Response Team). 2013. Removal Program Preliminary Assessment/Site Investigation Report Addendum for the Park Street Site, Bennington, Bennington County, Vermont, TDD No. 01-12-03-0002. March.

[7] U.S. Environmental Protection Agency. 2012. Office of Environmental Measurement and Evaluation. Laboratory Report. Project No. 12090038.Park Street – Bennington, VT – PCBs in Wipes. 15 October.

Appendices

Appendix A

Figures

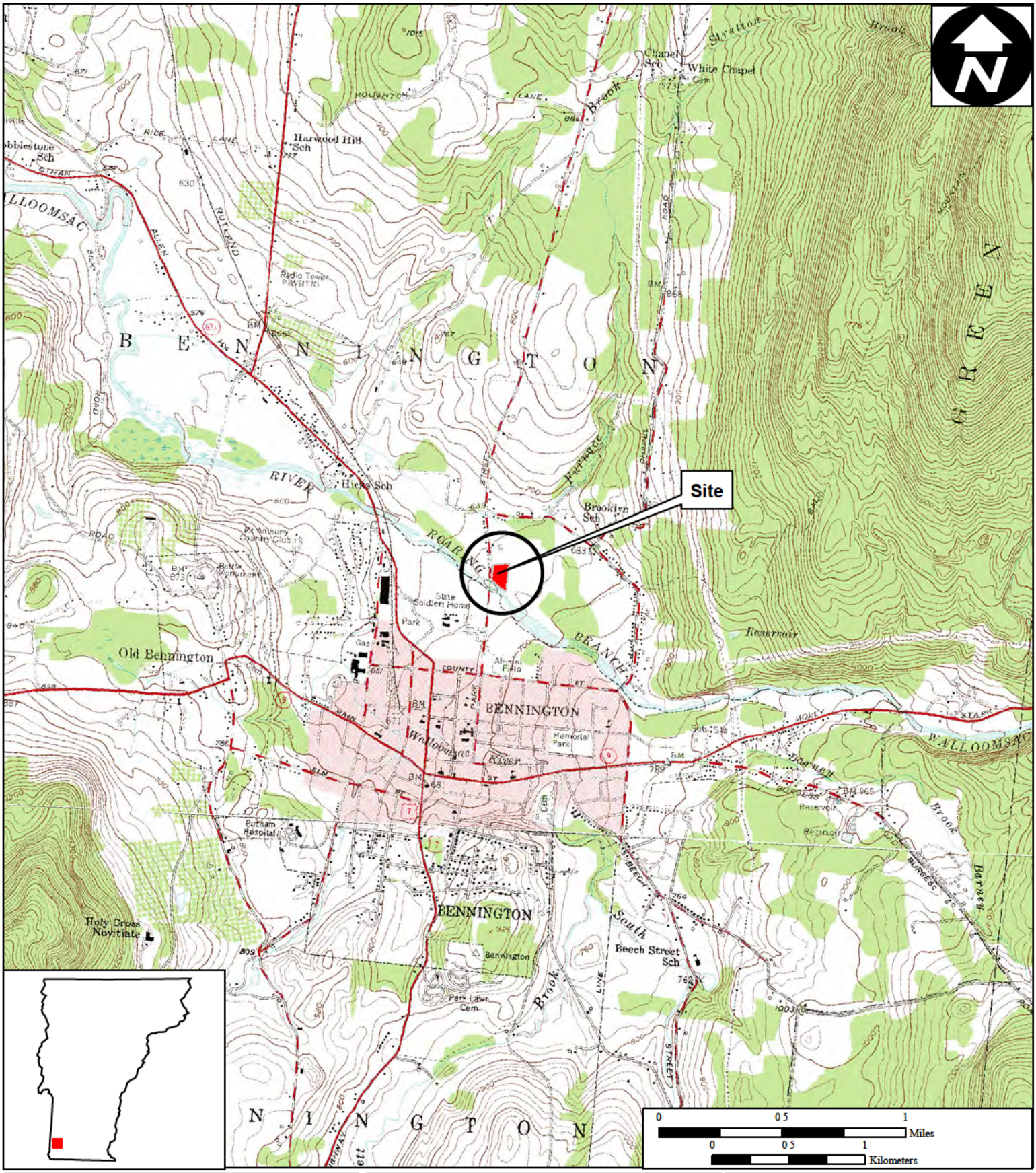

Figure 1

Site Location Map

Park Street Site
(b) (6)
Bennington, Vermont

EPA Region I
Superfund Technical Assessment and Response Team (START) III
Contract No. EP-W-05-042

TDD Number:	12-08-0005
Created by:	E. Ackerman
Created on:	23 March 2012
Modified by:	K. Robinson
Modified on:	16 August 2013

Data Sources:
Topos: MicroPath/USGS
Quadrangle Name: Bennington, Vermont
All other data: START

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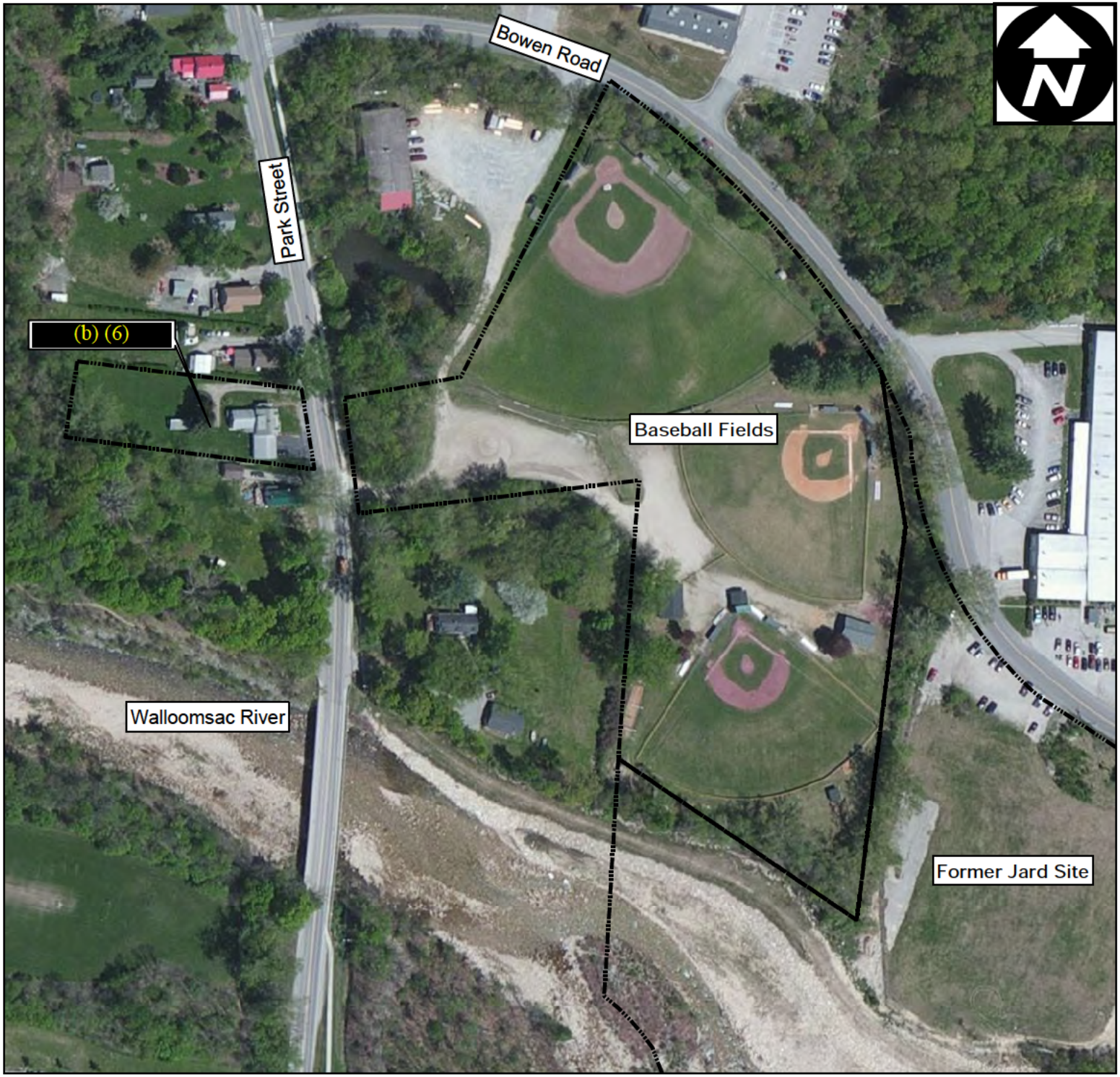

Figure 2

Site Diagram

Park Street Site
(b) (6)
Bennington, Vermont

EPA Region I
Superfund Technical Assessment and Response Team (START) III
Contract No. EP-W-05-042

TDD Number:	12-08-0005
Created by:	E. Ackerman
Created on:	23 March 2012
Modified by:	Christine Scesny
Modified on:	28 June 2013

Legend

Approximate Property Boundary

Feet

0 125 250

Data Sources:
Imagery: Bing Maps Aerial (Microsoft Corp)
All other data: START

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Appendix B

Photodocumentation Log

PHOTODOCUMENTATION LOG
Park Street Site – (b) (6) • Bennington, Vermont

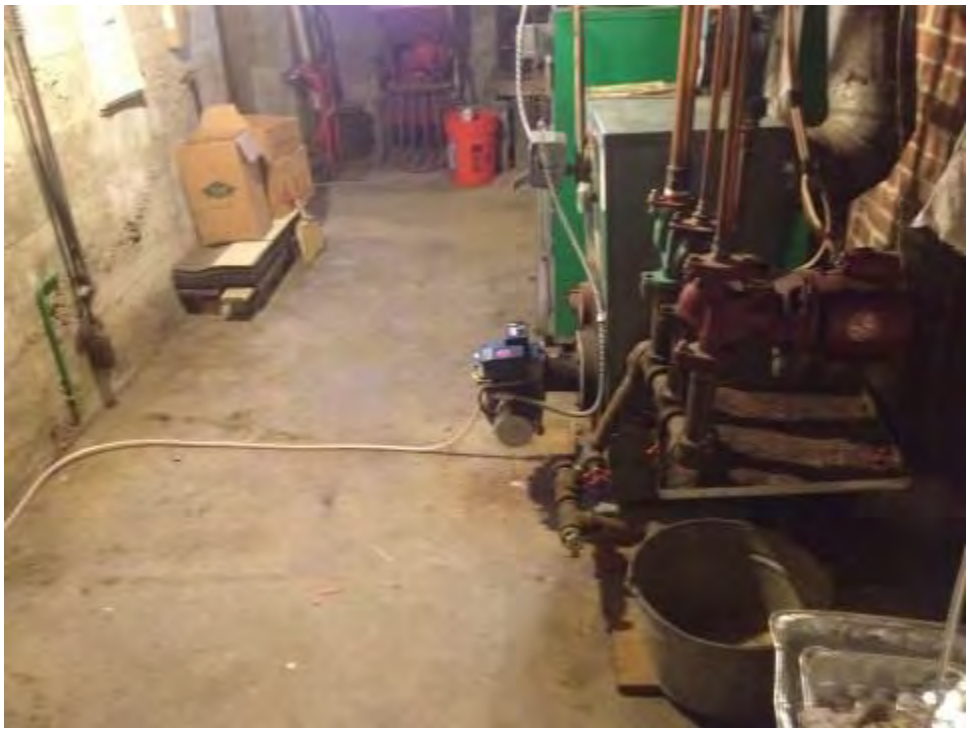
SCENE: View of the negative air system set up at (b) (6) during decontamination activities.

DATE: 20 September 2012 **TIME:** 0813 hours
PHOTOGRAPHER: Christine Scesny **CAMERA:** iPhone 4S

SCENE: View of the western central basement area at (b) (6) prior to decontamination.

DATE: 20 September 2012 **TIME:** 0814 hours
PHOTOGRAPHER: Christine Scesny **CAMERA:** iPhone 4S

SCENE: View of the southeastern basement area at (b) (6) prior to decontamination. Water is visible on the floors.
.
DATE: 20 September 2012 **TIME:** 0814 hours
PHOTOGRAPHER: Christine Scesny **CAMERA:** iPhone 4S



SCENE: View of the central basement area located behind the stairwell at (b) (6). The photograph was taken prior to decontamination activities.
DATE: 20 September 2012 **TIME:** 0815 hours
PHOTOGRAPHER: Christine Scesny **CAMERA:** iPhone 4S

SCENE: View of a hole in the northern basement wall at (b) (6). The photograph was taken prior to decontamination.
DATE: 20 September 2012 **TIME:** 0818 hours
PHOTOGRAPHER: Christine Scesny **CAMERA:** iPhone 4S

SCENE: View of the northeastern basement area at (b) (6) prior to decontamination.

DATE: 20 September 2012 **TIME:** 0818 hours
PHOTOGRAPHER: Christine Scesny **CAMERA:** iPhone 4S

SCENE: View of the location of particulate air monitor No. 2 at (b) (6). Photograph taken facing south.

DATE: 20 September 2012 **TIME:** 0820 hours
PHOTOGRAPHER: Christine Scesny **CAMERA:** iPhone 4S

SCENE: View of the location of particulate air monitor No. 1 at (b) (6) Photograph taken facing northeast.

DATE: 20 September 2012 **TIME:** 0821 hours
PHOTOGRAPHER: Christine Scesny **CAMERA:** iPhone 4S

SCENE: View of wipe sample (WS) locations WS-06 and WS-07 collected from the freezer doors at (b) (6). The photograph was taken following decontamination.
DATE: 22 September 2012 **TIME:** 1118 hours
PHOTOGRAPHER: Christine Scesny **CAMERA:** iPhone 4S

SCENE: View of wipe sample locations WS-08, WS-09, and WS-10 at (b) (6). The samples were collected from the furnace, washing machine, and the drying machine, respectively. The photograph was taken following decontamination.
DATE: 22 September 2012 **TIME:** 1119 hours
PHOTOGRAPHER: Christine Scesny **CAMERA:** iPhone 4S

SCENE: View of the portable storage unit at (b) (6). Photograph taken facing south.

DATE: 14 May 2013 **TIME:** 1000 hours
PHOTOGRAPHER: Kenneth Robinson **CAMERA:** iPhone 4S

SCENE: View of stored materials in the eastern portion of the basement of (b) (6). Photograph taken facing east.

DATE: 14 May 2013 **TIME:** 1005 hours
PHOTOGRAPHER: Kenneth Robinson **CAMERA:** iPhone 4S

SCENE: View of stored materials in the western portion of the basement of (b) (6). Photograph taken facing southwest.
DATE: 14 May 2013 **TIME:** 1300 hours
PHOTOGRAPHER: Kenneth Robinson **CAMERA:** iPhone 4S

SCENE: View of the portable storage unit at (b) (6). Photograph taken facing south.

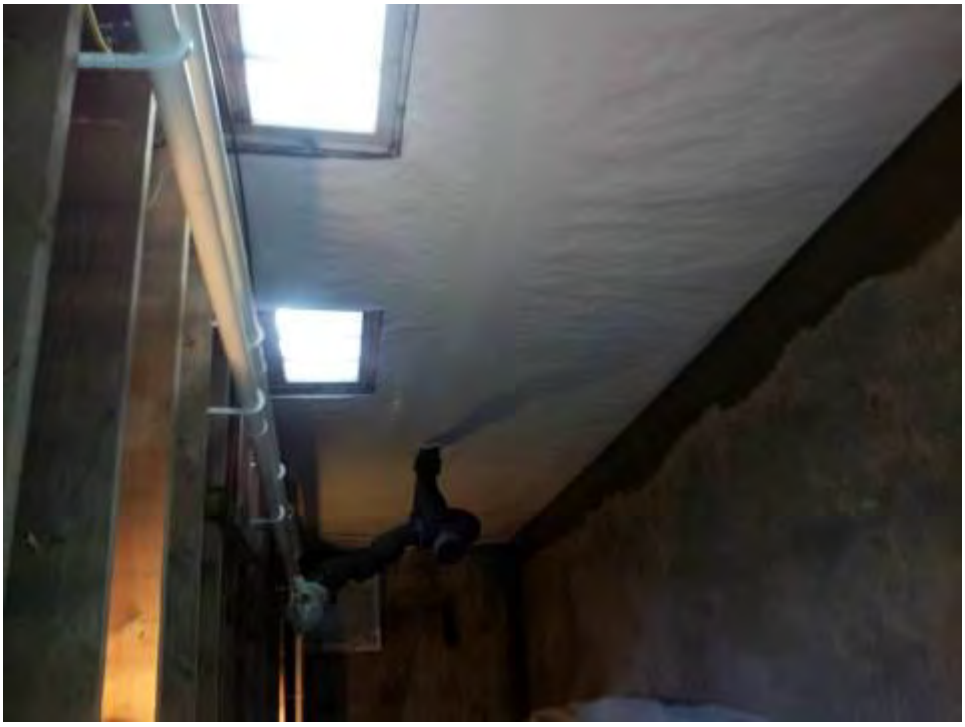
DATE: 14 May 2013 **TIME:** 1439 hours
PHOTOGRAPHER: Kenneth Robinson **CAMERA:** iPhone 4S

SCENE: View of the wood that was removed from the basement and stacked outside of (b) (6). Photograph taken facing west.
DATE: 14 May 2013 **TIME:** 1446 hours
PHOTOGRAPHER: Kenneth Robinson **CAMERA:** iPhone 4S

SCENE: View of polyethylene (poly) sheeting in the basement of (b) (6). Photograph taken facing west.

DATE: 14 May 2013 **TIME:** 1537 hours
PHOTOGRAPHER: Kenneth Robinson **CAMERA:** iPhone 4S

TOP



SCENE: View of the basement of (b) (6) after the installation of a poly liner and French Drain system. Photograph taken facing west.
DATE: 17 May 2013 **TIME:** 1521 hours
PHOTOGRAPHER: Dan Burgo **CAMERA:** Cannon PowerShot

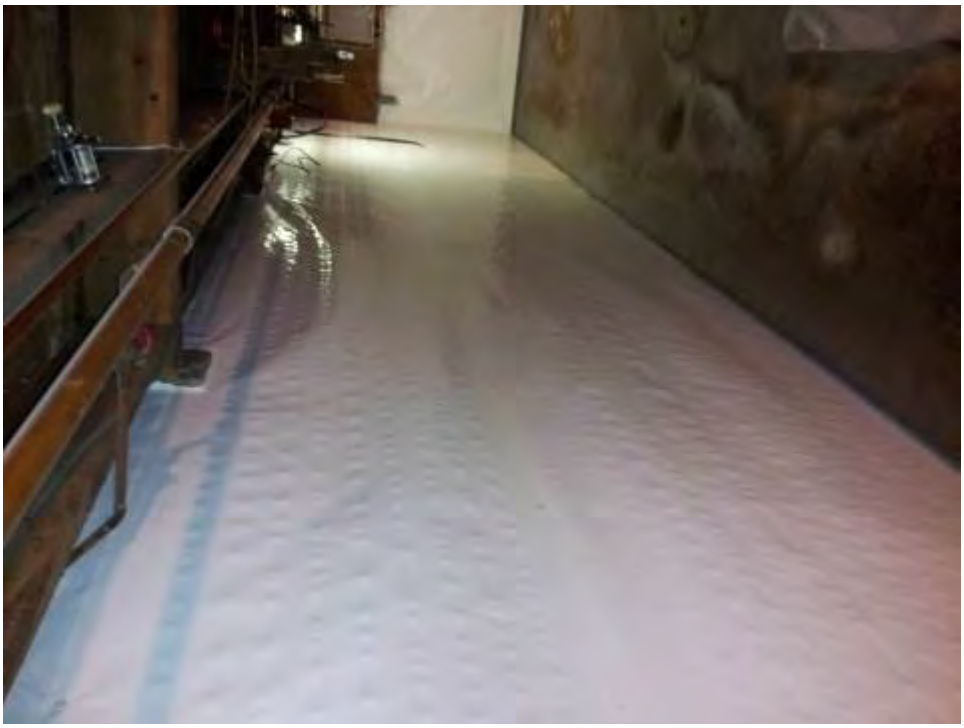
TOP

SCENE: View of the basement of (b) (6) after the installation of a poly liner and French Drain system. Photograph taken facing southwest.
DATE: 17 May 2013 **TIME:** 1521 hours
PHOTOGRAPHER: Dan Burgo **CAMERA:** Cannon PowerShot

TOP

SCENE: View of the basement of (b) (6) after the installation of a poly liner and French Drain system. Also, visible in the rear of the photograph is the aboveground storage tank on a crushed gravel platform. Photograph taken facing west.
DATE: 17 May 2013 **TIME:** 1522 hours
PHOTOGRAPHER: Dan Burgo **CAMERA:** Cannon PowerShot

TOP



SCENE: View of the basement of (b) (6) after the installation of a poly liner and French Drain system. Photograph taken facing south.
DATE: 17 May 2013 **TIME:** 1522 hours
PHOTOGRAPHER: Dan Burgo **CAMERA:** Cannon PowerShot

SCENE: View of a grate drain installed in the basement of (b) (6). The grate is located at the outside entryway to the basement. Photograph taken facing southeast.
DATE: 17 May 2013 **TIME:** 0521 hours
PHOTOGRAPHER: Dan Burgo **CAMERA:** Cannon PowerShot

SCENE: View of a small catchbasin to the drainage pipe installed in the yard of (b) (6).

DATE: 17 May 2013 **TIME:** 1520 hours
PHOTOGRAPHER: Dan Burgo **CAMERA:** Cannon PowerShot

TOP

SCENE: View of the sump pump system installed in the basement of (b) (6). Photograph taken facing west.

DATE: 20 May 2013 **TIME:** 1747 hours
PHOTOGRAPHER: Dan Burgo **CAMERA:** Cannon PowerShot

TOP

SCENE View of the sump pump system installed in the basement of (b) (6). Photograph taken facing west.

DATE: 20 May 2013 **TIME:** 1746 hours
PHOTOGRAPHER: Dan Burgo **CAMERA:** Cannon PowerShot

TOP

SCENE: View of effluent piping from the sump pump system from the (b) (6) basement. Photograph taken facing east.
DATE: 17 May 2013 **TIME:** 1521 hours
PHOTOGRAPHER: Dan Burgo **CAMERA:** Cannon PowerShot

SCENE: View of effluent piping from the sump pump system from the (b) (6) basement. Photograph taken facing south.
DATE: 12 July 2013 **TIME:** 1117 hours
PHOTOGRAPHER: Dan Burgo **CAMERA:** iPhone 5

SCENE: View of effluent piping from the sump pump system from the (b) (6) basement. Photograph taken facing south.
DATE: 12 July 2013 **TIME:** 1118 hours
PHOTOGRAPHER: Dan Burgo **CAMERA:** iPhone 5

SCENE: View of repaired vinyl siding around a water spigot at (b) (6) Photograph taken facing south.

DATE: 12 July 2013 **TIME:** 1118 hours
PHOTOGRAPHER: Dan Burgo **CAMERA:** iPhone 5

SCENE: View of repaired vinyl siding around a water spigot at (b) (6). Photograph taken facing south.

DATE: 12 July 2013 **TIME:** 1118 hours
PHOTOGRAPHER: Dan Burgo **CAMERA:** iPhone 5

Appendix C

Table 1 - Summary of Polychlorinated Biphenyl Results, Wipe Samples Collected at [redacted]

TABLE 1

SUMMARY OF POLYCHLORINATED BIPHENYL RESULTS
WIPE SAMPLES COLLECTED AT (b) (6)
PARK STREET SITE
BENNINGTON, VERMONT

SAMPLE LOCATION	WS-06	WS-07	WS-08	WS-09
SAMPLE NUMBER	R01-120917DB-0006	R01-120917DB-0007	R01-120917DB-0008	R01-120917DB-0009
SAMPLE DATE	9/22/2012	9/22/2012	9/22/2012	9/22/2012
SAMPLE SURFACE	FREEZER-01	FREEZER-02	FURNACE	WASHING MACHINE
	(b) (6)	(b) (6)	(b) (6)	(b) (6)
COMPOUND				
Aroclor-1016	ND	ND	ND	ND
Aroclor-1221	ND	ND	ND	ND
Aroclor-1232	ND	ND	ND	ND
Aroclor-1242	ND	ND	ND	ND
Aroclor-1248	ND	ND	ND	ND
Aroclor-1254	ND	ND	ND	ND
Aroclor-1260	ND	ND	ND	ND
Aroclor-1262	ND	ND	ND	ND
Aroclor-1268	ND	ND	ND	ND

SAMPLE LOCATION	WS-10
SAMPLE NUMBER	R01-120917DB-0010
SAMPLE DATE	9/22/2012
SAMPLE SURFACE	DRYING MACHINE
	(b) (6)
COMPOUND	
Aroclor-1016	ND
Aroclor-1221	ND
Aroclor-1232	ND
Aroclor-1242	ND
Aroclor-1248	ND
Aroclor-1254	ND
Aroclor-1260	ND
Aroclor-1262	ND
Aroclor-1268	ND

NOTES:

1) Samples analyzed by U.S. EPA Office of Environmental Measurement and Evaluation (OEME) using EPA Region I SOP, EIA:SOP-PCBWIPE1.SOP, PCBs in wipe sample.
2) All Results in Micrograms per wipe (µg/wipe).
3) ND = Not Detected.
4) Each wipe sample was collected over a non-porous surface area of 100 square centimeters (cm^2) and preserved in 10 milliLiters (mL) of Hexane.